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Attnorneys for Greg Vartanian, Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

**GREG VARTANIAN, on behalf
of himself and all others similarly situated,**

Plaintiffs.

vs.

**NATIONWIDE LEGAL, INC.,
NATIONWIDE LEGAL, LLC, and
DOES 1-100, inclusive.**

Defendant.

Plaintiff, Greg Vartanian, individually, and on behalf of putative class members (“Plaintiffs”), and Defendants, Nationwide Legal, Inc. and Nationwide Legal, LLC (“Defendants”), through their undersigned attorneys, stipulate and respectfully request that this Court approve an extension of time for Plaintiff to file his FLSA and Rule 23 Motion for Class Certification. As grounds for this extension, the parties state as follows:

1. On July 11, 2012 the parties filed their Joint Case Management Statement (D.E. 40) wherein Plaintiff requested that the court consider the issue of class certification on or before November 16, 2012, that any opposition be due 30 days after filing, and Plaintiff's reply be due 15 days thereafter.

2. The court entered Civil Minutes on July 16, 2012 (D.E. 41) setting a further Case Management Conference and hearing on FLSA and Rule 23 class certification for December 7, 2012.

3. The parties have exchanged discovery requests; however, due to case conflicts, as well as serious health problems within the Plaintiff's counsel's family, the parties need additional time to complete discovery for purposes of class certification.

4. Currently, a hearing is set on class certification for December 7, 2012 with Plaintiff's class certification brief due 35 days prior. The parties jointly stipulate and request the deadline for filing a motion for class certification be enlarged to February 23, 2013 in order to address conflicts and the holiday season. The parties likewise request the Court extend the related deadlines a like number of days.

WHEREFORE, PREMISES CONSIDERED, the parties stipulate to extend the time to file and serve Plaintiff's FLSA and Rule 23 Motion for Class Certification to February 23, 2013 and respectfully request the Court enter an order accordingly.

Dated: October 23, 2012

Respectfully submitted,

THE COCHRAN FIRM, LLC

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Attorneys for Plaintiff
GREG VARTANIAN

— and —

IT IS SO ORDERED that Plaintiff's class certification brief shall be filed by February 23, 2013. The motion will be heard on April 4, 2013 at 1:30 p.m. The December 7, 2012 case management conference is reset for Tuesday December 11, 2012 at 10:30 a.m., and an updated joint CMC statement shall be filed by December 4, 2012.

/s/ Erin Smith

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